

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UMG RECORDINGS, INC., CAPITOL  
RECORDS, LLC, SONY MUSIC  
ENTERTAINMENT, ARISTA MUSIC, ARISTA  
RECORDS LLC, ATLANTIC RECORDING  
CORPORATION, RHINO ENTERTAINMENT  
COMPANY, WARNER MUSIC INC., WARNER  
MUSIC INTERNATIONAL SERVICES  
LIMITED, WARNER RECORDS INC.,  
WARNER RECORDS LLC, and WARNER  
RECORDS/SIRE VENTURES LLC,

Plaintiffs,

v.

UNCHARTED LABS, INC., d/b/a Udio.com, and  
JOHN DOES 1-10,

Defendant.

Case No. 1:24-cv-04777-AKH

**NOTICE OF MOTION TO MAINTAIN UNDER SEAL PORTIONS OF EXHIBIT J TO  
THE PARTIES' JOINT LETTER MOTION**

Please take notice, upon the Declaration of Brittany N. Lovejoy, and the accompanying Memorandum of Law, Defendant Uncharted Labs, Inc., d/b/a Udio.com hereby moves this Court before the Honorable Alvin K. Hellerstein, United States District Judge, in the United States District Court for the Southern District of New York, 500 Pearl Street, New York, N.Y., on March, 18, 2025, or a return date to be determined by the Court, for an Order, pursuant to Paragraphs 20 and 21 of the Stipulated Protective Order entered in this case, Dkt. No. 67, and Rule 4(B) of the Individual Rules of the Honorable Alvin K. Hellerstein, to maintain under seal highlighted portions of Exhibit J to the parties' February 18, 2025 Joint Letter Motion previously filed under seal by Plaintiffs. *See* Dkt. No. 73 (sealed, highlighted version); *see also* Dkt. No. 71-10 (public, redacted version).

Dated: February 25, 2025

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<sup>1</sup> Udio uses electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

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